

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION**

<b>UNITED STATES OF AMERICA</b>	<b>*</b>	<b>CRIMINAL NO. 15-CR-00223-01</b>
	<b>*</b>	
<b>VERSUS</b>	<b>*</b>	<b>DISTRICT JUDGE FOOTE</b>
	<b>*</b>	
<b>SHAWN D. DRIGGERS</b>	<b>*</b>	<b>MAGISTRATE JUDGE HORNSBY</b>

**RESPONSE TO THE MOTION FOR DISCLOSURE OF  
EXCULPATORY AND IMPEACHING INFORMATION**

NOW INTO COURT, come the United States, through the United States Attorney for the Western District of Louisiana, who in response to the Motion for Disclosure of Exculpatory and Impeaching Information (Rec. Doc. 131) states the following:

The defense has requested specific documents and information related to statements of the victim as well as statements of witness Jackie Sanchez. In responding, the United States will direct the Court to the paragraph in the defense motion to which it is responding.

**Paragraph 5 (1-5)**

- 1) The United States has provided all prior statements of the victim including those requested by the defense.
- 2) Those statements list those present. Davin Chase was present during the

statements requested by the defense.

- 3) The victim provided that information in a telephone call to the Assistant United States Attorney approximately three (3) weeks prior to trial. That time is an approximation as the undersigned did not note the time and date of the call.
- 4) No one other than the prosecutor and the victim were present during that telephone call to the best of the knowledge of the undersigned Assistant United States Attorney.
- 5) The substance of the call was not memorialized. Approximately three (3) days prior to trial during pretrial preparation, the victim verified she had engaged in the conduct described in Paragraph 5. The undersigned Assistant United States Attorney was present along with co-counsel, and possibly Davin Chase.

**Paragraph 7 (1-5)**

- 1) The United States has provided all prior statements of the victim including those requested by the defense.
- 2) Those statements list those present. Davin Chase was present during the statements requested by the defense.
- 3) The victim provided that information in a telephone call to the Assistant United States Attorney approximately three (3) weeks prior to trial. That time is an approximation as the undersigned did not note the time and date of the call.

- 4) No one other than the prosecutor and the victim were present during that telephone call to the best of the knowledge of the undersigned Assistant United States Attorney.
- 5) The substance of the call was not memorialized. Approximately three (3) days prior to trial during pretrial preparation, the victim verified she had engaged in the conduct described in Paragraph 5. The undersigned Assistant United States Attorney was present along with co-counsel, and possibly Davin Chase.

**Paragraph 9 (1-3)**

- 1) The witness made the statement during a pretrial interview. The interview took place the week prior to the trial of the defendant.
- 2) The undersigned Assistant United States Attorney along with co-counsel and Davin Chase were present for the interview of the witness. To the best of the undersigned's knowledge and belief no one else was present during the interview.
- 3) To the best of the undersigned knowledge and belief, the witness never denied having a sexual relationship with the defendant.

**Paragraph 10**

The United States will make available to the defense prior statements of the witness. The United States already provided all recorded statements to the defense. Out of an abundance of caution, any additional summaries of statements will also be

provided to the defense. The United States has previously provided all statements of the victim to the defense.

Respectfully submitted,

ALEXANDER C. VANHOOK  
Acting United States Attorney

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 24th day of July, 2017, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to counsel of record by operation of the Court Electronic Filing System.

s/ John Luke Walker  
JOHN LUKE WALKER, ID # 18077  
Assistant United States Attorney